

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE, TENNESSEE**

**RONALD McDANIEL,**

**Plaintiff,**

**v.**

**No.: 3:12-CV-208  
(VARLAN/SHIRLEY)**

**SEVIER COUNTY, TENNESSEE;  
RONALD SEALS; LUCAS TALLENT, EMT-IV;  
DR. ROBERT MAUGHON; FIRST MED, INC.;  
TAMMY FINCHUM; KARASTYN LUNGER;  
SHAUN MOSHER; ANDY LOVEDAY;  
RHETT RUTLEDGE; STEVE OGLE; JAMES  
OGLE; JACK MOUNT; SCOTT WEBB; ALEX  
ALFONSO; KENT HATCHER; JANE DOES; and  
EDWARD DAHM**

**Defendants.**

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**AGREED PROTECTIVE ORDER**

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Come the parties, by agreement and for good cause shown, it is hereby **ORDERED** as follows:

The plaintiff, Ronald McDaniel, by and through his attorneys, has requested the defendants to make available for inspection and/or copying, documents and various materials including but not limited to material regarding the Sevier County jail policies, procedures and layout;

The defendants contend that some of these documents, information in the materials, including policies, procedures, and jail design are in whole, or in part proprietary information, confidential business records or information not generally made available to the public, all of which are sensitive data as hereinafter defined;

The defendants desire that the confidentiality of the documents and/or materials and the information contained in the documents and materials be maintained as well as the confidentiality of the fact of the existence of the documents and materials, and other description and identity; and the parties' attorneys agree on the conditions set out here below, therefore it is hereby

ORDERED that:

1) The defendants must designate any documents claimed to be proprietary or confidential that defendants contend are governed by this Protective Order.

2) Any materials obtained during discovery in this case, that are proprietary and confidential in nature are only to be disseminated by the parties to this litigation, their counsel, their consultants, employees, experts and others necessary to prepare for litigation. It is understood that the parties counsel, their consultants, employees or any experts that see such documents shall maintain the confidentiality of such documents and information, and shall restrict the use of such information solely to the preparation and prosecution of this litigation.

3) Prior to the disclosure of confidential information the person(s) to whom disclosure is made shall be made aware of the terms of this order and agrees to treat such documents or information as confidential and to be bound by the terms of this order.

4) At the conclusion of the work of such experts, consultants or other persons as described above, all confidential documents and materials and all copies, prints or negatives of materials provided to the parties counsel by the defendant including any additional copies made for the purpose of litigation shall return such documents within 45 days to counsel for the defendant at the completion of litigation.

5) The terms of this Protective Order shall remain fully active until released by written consent of the defendants. The Court shall retain jurisdiction over the parties and this Protective Order and recipients of confidential documents and materials for the sole purpose of enforcing this Protective Order.

6) The obligation of confidentiality contained herein shall survive the final conclusion of this civil action.

IT IS SO ORDERED.

ENTER this 4th day of September 2013.

s/ Thomas A. Varlan

CHIEF UNITED STATES DISTRICT JUDGE

APPROVED FOR ENTRY:

/s/ Rhonda L. Bradshaw

Rhonda L. Bradshaw - 014082  
Attorney for Defendants Sevier County,  
Tennessee  
R. Seals, S. Mosher, A. Loveday, R. Rutledge  
S. Ogle, J. Ogle, J. Mount, S. Webb, A.  
Alfonso and K. Hatcher  
Spicer Rudstrom, PLLC  
800 S. Gay Street, Suite 1100  
Knoxville, TN 37929  
865-673-8516

/s/ William C. Bovender

Jimmie C. Miller - 009756  
William C. Bovender - 000751  
Attorney for Plaintiff  
Hunter, Smith & Davis, LLP  
P.O. Box 3740  
Kingsport, TN 37664  
423-378-8858

/s/ Daniel T. Swanson

Heidi A. Barcus - 015981  
Daniel T. Swanson – 023051  
Attorneys for First Med, Karstyn Lunger,  
Lucas Tallent and Dr. Robert Maughon  
London & Amburn PC  
BankEast Bldg.  
607 Market St., Ste. 900  
Knoxville, TN 37902  
865-637-0203

/s/ Bryan Essary

Bryan Essary - 014304  
Blake Carter – 030098  
Attorneys for Tammy Finchum  
Gideon, Cooper & Essary, PC  
1100 Noel Place  
200 Fourth Avenue North  
Nashville, TN 37219  
615-254-0400